

**STIPULATION--TESTIMONY OF  
SCOTT W. JACKSON**

Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network (Trinity) and Glendale Broadcasting Company (Glendale) now stipulate that if Scott W. Jackson were called to testify, he would testify as follows:

1. Monroe, Georgia, the community of license of WHSG-TV, is located in Walton County, Georgia. Monroe is approximately thirty-five miles east of Atlanta, Georgia.

2. Mr. Jackson does not recall any program that ran during the License Term (as that term is defined in Trinity Exhibit 32) that featured a host or guest from Monroe, Georgia or Walton County, Georgia. Except for (1) the Praise The Lord programs where Bishop Earl Paulk and Dottie Rambo were interviewed (Paragraph 33 of TBN Exhibit 32), and (2) the programs described in Paragraphs 36-38 of Trinity Exhibit 32, Mr. Jackson is not aware of any program broadcast on WHSG-TV during the license term that featured a host or guest from the WHSG-TV service area.

3. Mr. Jackson cannot recall any program broadcast on WHSG-TV during the License Term that covered an event, issue or problem peculiar to Monroe, Georgia or Walton County, Georgia.

4. In the course of his ascertainment efforts, Mr. Jackson did not make any use of the Walton Tribune, a newspaper of general circulation in Walton County, Georgia and published in the county seat of Monroe, Georgia.

Federal Communications Commission

Docket No. 93/56 Excluded 26.5

Presented by G. L. L. L. L.

Disposition

Identified 5.17.94  
Reviewed 5.17.94  
Rejected \_\_\_\_\_

Reporter Am

Date 5.17.94

5. During the relevant License Term, Walton County, Georgia maintained its own fire, police, water, sewage, hospital and public education systems separate and apart from those in Atlanta, Georgia.

6. In the course of interviewing community leaders for ascertainment purposes, Mr. Jackson does not recall interviewing any community leaders from Monroe, Georgia during the License Term. None of the community leader interview forms produced by Trinity indicate any interviews of community leaders from Monroe, Georgia or Walton County, Georgia.

7. Mr. Jackson and Mr. D'Amico began conducting ascertainment interviews of community leaders in September 1991, pursuant to instructions from Jane Duff's office at Trinity headquarters. In the third and fourth quarters of 1991, Mr. Jackson and Mr. D'Amico interviewed a total of seventy-five community leaders in each quarter because Mr. Jackson believed that was the number of community leaders that were supposed to be interviewed each quarter. By the first quarter of 1992, Mr. Jackson learned that only twenty-five community leaders had to be interviewed each quarter to be compliant with Trinity procedures, and that was the number of community leaders who were interviewed in the first quarter of 1992.

8. Every time a community leader, newspaper story, or other source mentioned an issue that was listed on the station's "Tabulation of Ascertainments" form, that mention would be noted. The total number of mentions of each issue from each source would

be tabulated. The issue with the greatest number of total mentions would be considered the most important issue, the issue with the second greatest number of total mentions would be considered the second most important issue, and so on. The tabulation for the third quarter of 1991 is submitted as Attachment 1 to this exhibit. The tabulation for the fourth quarter of 1991 is submitted as Attachment E to Trinity Exhibit 32. The tabulation for the first quarter of 1992 is submitted as Attachment 2 to this exhibit.

9. Mr. Jackson understood that he was to try to interview at least one or two community leaders in each of the nineteen categories listed in Attachment C of Trinity Exhibit 32. Initially, he understood that once that requirement was met, there was no additional requirement to spread out the remaining interviews among different categories of organizations. At some point during the License Term, Trinity headquarters told Mr. Jackson not to concentrate a large number of interviews in any one category of organizations.

10. As noted in Paragraph 11 of Trinity Exhibit 32, the printed media publications were not counted in determining the top issues in the fourth quarter of 1991. That omission was an oversight and not a conscious decision.

11. In the first quarter of 1992, state and federal government received a total of seventy-nine mentions, which was the second most number of mentions received by any issue. Trinity headquarters did not have any program that was responsive to that issue. Pursuant to instructions from Jane Duff's office, Mr.

Jackson did not list state and federal government as one of the top issues in the community because there were no programs responsive to that issue.

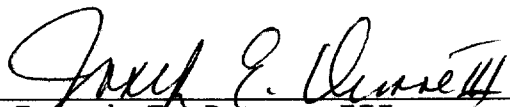
12. Mr. Jackson has no recollection of how viewers' phone calls were received or tabulated in connection with ascertainment during the first quarter of 1992.

13. Joy was a program that featured music as well as interviews.

14. The Earl Paulk Show, In Touch, and Changing Your World were all programs where the producers paid to have their programs aired on WHSG-TV and/or the Trinity Broadcasting Network. The Earl Paulk and In Touch programs were one hour in length, and Changing Your World was one-half hour in length.

**TRINITY CHRISTIAN CENTER OF SANTA  
ANA, INC., d/b/a TRINITY  
BROADCASTING NETWORK**

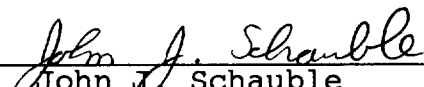
By

  
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ATTACHMENT 1

TRINITY BROADCASTING OF MONROE/ATLANTA  
DESIGNATION OF TOP COMMUNITY PROBLEMS  
FROM THE AVAILABLE SOURCES  
IN THE CHANNEL 63  
VIEWING AREA

JULY, AUGUST, SEPTEMBER 1991

GOVT/ STATE/ FED.	47
EDUCATION/ SCHOOL	41
HEALTH CARE	35
CRIME	19
SR. CITIZENS/ AGING	19
TRANSPORTATION	19

3rd Quarter, 1991

KTBN - CHANNEL 40  
SANTA ANA, CA

TABULATION OF ASCERTAINMENTS

*July, August, September*

PROBLEMS/ ISSUES	RESPONSES FROM CIVIC LEADERS	PRINTED MEDIA PUBLS	T.V./ RADIO	VIEWERS' PHONE RESPONSES	<del>S.A.</del> <del>CITY COUNCIL</del> <del>AGENDA</del> TOTALS
ABORTION		2			2
AIDS	1 (1)	1			2
CHILD ABUSE	1 (1)				1
CHILD CARE		8			8
COST OF LIVING/INFLA- TION/POVERTY	1 (1)	4			5
CRIME	HH (5)	14			19
DRUGS/ALCOHOL ABUSE	HHH (6)	2			8
DISCRIMINA- TION/MINORITY	1 (1)	12			13
FAMILY/SINGLES	1 (1)				1
GOVT/STATE/FED	HH (5)	42			47
EDUCATION/ SCHOOLS	HHH HH HH HH HH (23)	18			41
HEALTH CARE	HH HH HH HH HH HH (27)	8			35
HOMELESS	1 (2)	1			3
HOUSING	HHH (7)	11			18
IMMIGRATION					
POLUTION/ ENVIRONMENT	HHH (4)	5			9
SR CITIZENS/ AGING	HH HH HH (15)	4			19
TRANSPORTATION	HH HH (11)	8			19
UNEMPLOYMENT	HH (5)	5			10
YOUTH/GANGS	HHH (8)	2			10
GAY RIGHTS					

POLUTION/ ENVIRONMENT	III	(4)	5			9
SR CITIZENS/ AGING	III III III	(15)	4			19
TRANSPORTATION	III III I	(11)	8			19
UNEMPLOYMENT	III	(5)	5			16
YOUTH/GANGS	III III	(8)	2			10
GAY RIGHTS						
WATER						
MARRIAGE/DIV						
GROWTH/POPULA- TION	III	(3)	5			8
HOMOSEXUALITY						
PORNOGRAPHY						
SEP OF CH/STATE						
APATHY			1			1



ATTACHMENT 2

TRINITY BROADCASTING OF ATLANTA  
DESIGNATION OF TOP COMMUNITY PROBLEMS  
FROM THE AVAILABLE SOURCES  
IN THE CHANNEL 63  
VIEWING AREA

JANUARY, FEBRUARY, MARCH, 1992

CRIME	135
EDUCATION/SCHOOLS	73
HEALTH CARE	56
DRUG/ALCOHOL ABUSE	55

WHSB -CHANNEL 63  
MONROE-ATLANTA, GA

TABULATION OF ASCERTAINMENTS

PROBLEMS/ ISSUES	RESPONSES FROM CIVIC LEADERS	PRINTED MEDIA PUBLS	T.V. / RADIO	VIEWERS' PHONE RESPONSES	TOTALS S.A. CITY-CNCL AGENDA
ABORTION	0	6		0	6
AIDS	4	1		9	14
CHILD ABUSE	0	0		4	4
CHILD CARE	1	6		6	13
COST OF LIVING/INFLA- TION/POVERTY	2	12		2	16
CRIME	9	57		69	135
DRUGS/ALCOHOL ABUSE	8	27		20	55
DISCRIMINA- TION/MINORITY	1	25		4	30
FAMILY/SINGLES	1	2		4	7
GOVT/STATE/FED	2	66		11	79
EDUCATION/ SCHOOLS	11	54		8	73
HEALTH CARE	5	32		19	56
HOMELESS	6	4		24	34
HOUSING	0	13		2	15
IMMIGRATION	0	5		0	5
POLLUTION/ ENVIRONMENT	3	9		4	16
SR CITIZENS/ AGING	2	2		9	13
TRANSPORTATION	2	13		8	23
UNEMPLOYMENT	6	13		25	44
YOUTH/GANGS	5	12		0	17
GAY RIGHTS	0	2		0	2
WATER	0	7		0	7
MARRIAGE/DIV	0	1		4	5
GROWTH/POPULA- TION	0	0		2	2
HOMOSEXUALITY	0	0		0	0
PORNOGRAPHY	0	0		1	1
SEP OF CH/STATE	0	0		0	0
APATHY	3	0		3	6

VIEWERS'  
PHONE  
RESPONSES

STRAY ANIMALS	1
TAXES	4
TEENAGE SEX	8
WELFARE	2
LOW MORALS	4

**STIPULATION--TESTIMONY OF  
LINDEE C. CONNOLLY**

Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network (Trinity) and Glendale Broadcasting Company (Glendale) now stipulate that if Lindee C. Connolly were called to testify, she would testify as follows:

1. Mrs. Connolly does not recall any program that was broadcast on WHSG-TV during the License Term (as that term is defined in Trinity Exhibit 32) that featured a host or guest from Monroe, Georgia or Walton County, Georgia.

2. Mrs. Connolly does not recall any program that was broadcast on WHSG-TV during the License Term that covered an event, issue or problem peculiar to Monroe, Georgia or Walton County, Georgia.

3. Mrs. Connolly does not recall any specific instance during the License Term when she scheduled a public service announcement for the purpose of meeting a need or problem within the WHSG-TV service area.

4. The Joy program was thirty minutes in length, not one hour long as stated in Paragraph 11 of Trinity Exhibit 33.

5. A Call To Action and New Direction were not produced within the WHSG-TV service area during the License Term.

6. Feedback was produced by WHFT(TV) in Miami, Florida. In reviewing the topics and guests for that program, Mrs. Connolly would determine if the proposed program was responsive to an issue

Federal Communications Commission

Doc No 93-156 Filed 5.17.94

Presented by Glen Del

Disposition

{ Identified 5.17.94  
Revised 5.17.94  
Revised

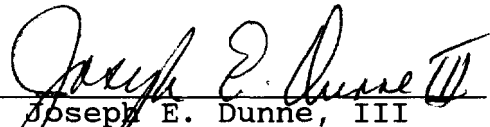
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Date 5.17.94

or program in the Miami, Florida area.

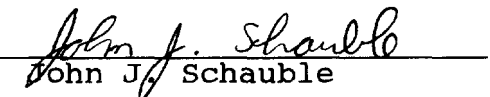
7. The WHSG-TV program logs are the best evidence of what was actually broadcast on the station.

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC. d/b/a TRINITY  
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MM Docket No. 93-156  
Joint Exhibit No. 7

**STIPULATED TESTIMONY OF GEORGE F. GARDNER**

My name is George F. Gardner. Following is my sworn testimony for submission to the Federal Communications Commission in MM Docket No. 93-156.

I am the president and majority stockholder of Glendale Broadcasting Company ("Glendale"). Mary Anne Adams is Glendale's vice-president, and the only other stockholder. Glendale has pending an application for television channel 63, Monroe, Georgia (BPCT-920228KE). This application is currently mutually exclusive with the renewal application of the Trinity Christian Center of Santa Ana, Inc., the licensee of WHSG-TV, Monroe, Georgia (BRCT-911129KR).

Glendale filed its application for channel 63 at Monroe, Georgia on February 28, 1992. The engineering portion of that application was prepared by John J. Mullaney, Mullaney Engineering, Inc., 9049 Shady Grove Court, Gaithersburg, Maryland 20877.

Glendale's original proposal was to construct a 328.3 meter (1,077 feet) above ground level tower and top mount a Dielectric antenna (Model No. TFU36JDAS). The overall height of the antenna tower and the antenna above ground was proposed to be 342.6 meters (1,124 feet) above ground level. The coordinates for this proposed site were NL 33° 46' 17", WL 84° 00' 25". The site was in Gwinnett County, 11 kilometers south of Snellville, Georgia.

Glendale also engaged the services of John P. Allen, an aerospace consultant, to assist it in filing required forms with

<u>Federal</u>		<u>Union Commission</u>	
Docket No.	93-156	542	
Presented by	Glen Dale		
Disposition	Identified	5-17-94	
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	Rejected		
Reporter	AW		
Date	5-17-94		



the Federal Aviation Administration to obtain a determination of no hazard to air navigation ruling regarding Glendale's original (and later amended) proposed antenna site. On behalf of Glendale, Mr. Allen filed a Notice of Proposed Construction or Alternation with the FAA on February 19, 1992 (Aeronautical Study No. 92-ASO-0381-OE).

At the time Glendale filed its original application for channel 63 at Monroe, I was aware at the time I signed the application that Glendale was requesting a waiver of the FCC's spacing rules (Rule 73.610). I knew that the FCC had rules governing the minimum spacing required between co-channels. Glendale's application was short-spaced to the allocation of channel 63 to Montgomery, Alabama.

The original antenna site (and later amended site) proposed by Glendale was found by Mr. Gregory B. Daly of Telsa Inc., P. O. Box 32223, Washington, D.C. 20007. At no time during the process of locating Glendale's original antenna site, nor during the preparation of Glendale's application for channel 63 at Monroe, did I or Mary Anne Adams instruct Messrs. Mullaney, Allen or Daly to look for an antenna site that was fully spaced to the channel 63, Montgomery, Alabama allocation. I was thus unaware at the time whether there were any fully spaced sites at which Glendale could propose to locate its antenna site. I was relying upon my FCC counsel, Mr. Mullaney and Mr. Allen to prepare an application that would be acceptable to both the FCC and the FAA.

In the latter part of 1992 I was advised by Messrs. Allen and Mullaney that the antenna site originally proposed by Glendale was not going to be approved by the FAA (meaning the FAA was not going to issue a determination of no hazard to air navigation) unless Glendale agreed to reduce the height of the antenna tower to 500 feet above ground, or move to a new site which did not pose visual flight rule problems. I understood that if Glendale reduced the height of its tower to 500 feet above ground at its original site, Glendale would serve fewer people than in its original proposal.

On March 5, 1993 Glendale amended its channel 63, Monroe application to specify a new antenna site. That site was 33° 44' 38", 84° 00' 39", an area in Rockdale County, five miles north of Conyers, Georgia. The antenna tower Glendale specified at the amended site is 317.6 meters (1,042 feet) above ground level. Glendale has proposed to top-mount a Dielectric antenna (Model No. TFU36JDAS) which will result in a total above ground height for the tower and antenna of 331.9 meters (1,089 feet). The purpose of the amendment was to move to a site that Glendale believed would allow it to receive a determination of no hazard to air navigation from the FAA. Neither Ms. Adams nor myself instructed Messrs. Allen, Daly or Mullaney to look for an antenna site which was fully spaced to the Channel 63, Montgomery, Alabama allocation, and no such site was considered by Glendale. Glendale's amended antenna site proposal also requested a waiver of the FCC's co-channel spacing rule (Rule 73.610) because of the distance to the Channel 63,

Montgomery Alabama allocation. To the best of my knowledge, at the time Glendale filed its March 5, 1993 amendment, neither Ms. Adams nor I, nor Messrs. Mullaney, Daly or Allen, were aware of whether there were any fully spaced sites available. The only sites Glendale submitted to the FAA and the FCC for approval were its original proposed antenna site, and its amended antenna site, as described above.

I hereby declare under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge and belief. I further understand this testimony has been prepared for submission to the FCC in MM Docket No. 93-156.

Date:

May 3, 1994  
George F. Gardner